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Attorney at Law

EXHIBIT " A "

URGENT!

DELIVERED BY HAND

April 26, 2005

Attorney Lawrence S. Elswit
Boston University
Office of the General Counsel
125 Bay State Road
Boston, MA 02215

RE: Discovery requests for: **Civil Action No. 04-CV-11838-PBS,**
Layla Kiani v. Trustees of Boston University et al

Dear Attorney Elswit,

As you know, per Judge Saris's orders, the discovery period will come to an end on April 29, 2005. As you also know, my client, Layla Kiani, pursuant to Rules 33 and 34 of Federal Rules of Civil Procedure, had sent you the **First set of Interrogatories and Requests for production of Documents** on January 31, 2005. Although you have sent me your clients' responses to both of these discovery requests, these "responses" have failed to substantially provide the responses to several key questions or requests. In fact, a large number of these were either answered incompletely, or were simply not answered or provided at all in the manner required by the questions or requests.

I verbally, and in a face-to-face conversation, have asked you to please respond by providing full disclosure to my client's questions and requests. You have refused. You have argued that the questions are either "unduly burdensome, not reasonably calculated to lead to discovery of relevant, probative, or admissible evidence" or that they invade the students' privacy. I sincerely and seriously disagree that any of these questions or requests fit in the above categories. As I have also said to you, if any of the questions or requests require the disclosure of names or personal information of a student, my client hereby amends her discovery request, and agrees that you simply black out the student's information and provide the document. Without these documents, we will simply not be able to litigate this matter.

In the attached pages, once again, I am providing you a list of questions and requests, which have remained unresponded. Unless your clients respond to these discovery requests by Thursday, April 28, 2005, I will have no choice but to file a motion under Rule 37 of the Federal Rules of Civil Procedure, asking the Court to compel your

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